

Teresa M. Corbin (SBN 132360)
 Denise M. De Mory (SBN 168076)
 Ethan B. Andelman (SBN 209101)
 Jaclyn C. Fink (SBN 217913)
 HOWREY LLP
 525 Market Street, Suite 3600
 San Francisco, California 94105
 Telephone: (415) 848-4900
 Facsimile: (415) 848-4999

Attorneys for Plaintiff SYNOPSYS, INC.
 and for Defendants AEROFLEX INCORPORATED,
 AMI SEMICONDUCTOR, INC., MATROX
 ELECTRONIC SYSTEMS, LTD., MATROX
 GRAPHICS, INC., MATROX INTERNATIONAL
 CORP., MATROX TECH, INC., and
 AEROFLEX COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,
 Plaintiff,

vs.

AEROFLEX INCORPORATED, AMI
 SEMICONDUCTOR, INC., MATROX
 ELECTRONIC SYSTEMS LTD., MATROX
 GRAPHICS INC., MATROX INTERNATIONAL
 CORP., MATROX TECH, INC., AND
 AEROFLEX COLORADO SPRINGS, INC.

Defendants.

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

Case No. C03-04669 MJJ (EMC)

Case No. C03-02289 MJJ (EMC)

**DECLARATION OF DAVID CHIAPPINI IN
 SUPPORT OF DEFENDANTS' MOTION FOR
 SUMMARY JUDGMENT REGARDING THE
 SCOPE OF PATENT DAMAGES FOR
 ALLEGED INFRINGEMENT OF U.S.
 PATENT NO. 4,922,432**

FILED UNDER SEAL

Date: September 26, 2006

Time: 9:30 a.m.

Courtroom: 11, 19th Floor

Judge: Martin J. Jenkins

**CONFIDENTIAL FILED UNDER SEAL
 PURSUANT TO PROTECTIVE ORDER**

1 I, David Chiappini, declare as follows:

2 1. I am Project Director at Matrox Graphics ("Matrox"). I make this declaration of my
3 personal knowledge, and if called as a witness, I could and would testify competently to the statements
4 contained herein.

5 2. I have been employed by Matrox since 1994 and I have been in my current position since
6 2002. My general duties include supervising and managing the ASIC Group and all resources related
7 thereto as well as foreseeing the ASIC development and tapeout on schedule. My general duties also
8 require me to understand customer needs and demands regarding Matrox's products including graphic
9 boards.

10 3. Matrox's use of the Synopsys Design Compiler system for logic synthesis is just one of at
11 least 20 steps that must occur in order to create an ASIC. Matrox does not usually sell ASICs directly to its
12 customers; Matrox sells graphics boards that have multiple components including an ASIC chip.

13 4. Generally, the cost of an ASIC ranges from \$20 to \$50, and the cost of the graphics boards
14 that Matrox sells, ranges from hundreds of dollars to several thousands of dollars.

15 5. Matrox's use of the Synopsys Design Compiler system for logic synthesis to design an
16 ASIC does not form the basis for customer demand for Matrox's graphics boards.

17
18 I declare under penalty of perjury under the laws of the United States of America that the foregoing
19 is true and correct. This declaration was executed at Dorval, Quebec, Canada, on August 18, 2006.

20
21
22 By: 

David Chiappini